

1 COOLEY LLP
2 BOBBY GHAJAR (198719)
(bghajar@cooley.com)
3 COLETTE GHAZARIAN (322235)
(cghazarian@cooley.com)
4 1333 2nd Street, Suite 400
Santa Monica, California 90401
5 Telephone: (310) 883-6400

6 MARK WEINSTEIN (193043)
(mweinstein@cooley.com)
7 KATHLEEN HARTNETT (314267)
(khartnett@cooley.com)
8 JUDD LAUTER (290945)
(jlauter@cooley.com)
9 Elizabeth L. Stameshkin (260865)
(lstameshkin@cooley.com)
10 3175 Hanover Street
Palo Alto, CA 94304-1130
11 Telephone: (650) 843-5000

12 LEX LUMINA PLLC
13 MARK A. LEMLEY (155830)
(mlemley@lex-lumina.com)
14 745 Fifth Avenue, Suite 500
New York, NY 10151
15 Telephone: (646) 898-2055

16 CLEARY GOTTLIEB STEEN & HAMILTON LLP
17 ANGELA L. DUNNING (212047)
(adunning@cgsh.com)
18 1841 Page Mill Road, Suite 250
Palo Alto, CA 94304
19 Telephone: (650) 815-4131

20 *Counsel for Defendant Meta Platforms, Inc.*

21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

29 RICHARD KADREY, *et al.*,
30 Individual and Representative Plaintiffs,
31 v.
32 META PLATFORMS, INC., a Delaware
33 corporation;
34
35 Defendant.

36 Case No. 3:23-cv-03417-VC-TSH

37 **DECLARATION OF MICHELLE WOODHOUSE**
IN SUPPORT OF ADMINISTRATIVE MOTION
TO FILE UNDER SEAL JOINT DISCOVERY
LETTER BRIEF AND EXHIBITS

1 I, Michelle Woodhouse, hereby declare:

2 1. I am an Associate General Counsel for Defendant, Meta Platforms, Inc. I have
 3 personal knowledge of the facts set forth in this declaration and, if called to testify as a witness,
 4 could and would testify competently thereto.

5 2. I make this declaration in support of Meta's administrative motion to file under seal
 6 the Joint Letter Brief on Meta's Motion to Compel ("Joint Letter Brief") and Exhibits 1, 2, and 4
 7 to the Joint Letter Brief. The motion seeks to have the following partially sealed or entirely sealed:

Document	Sealing Request
Joint Discovery Letter Brief	<ul style="list-style-type: none"> Redacted portions
Exhibit 1 to Joint Discovery Letter Brief	<ul style="list-style-type: none"> Redacted portions
Exhibit 2 to Joint Discovery Letter Brief	<ul style="list-style-type: none"> Redacted portions
Exhibit 4 to Joint Discovery Letter Brief	<ul style="list-style-type: none"> Redacted portions

14 3. Exhibit 1 comprises excerpts of the deposition transcript of Eleonora Presani, which
 15 includes discussion of highly sensitive information regarding Meta's AI development and regarding
 16 potential partnerships relating to AI development. Public disclosure of the redacted information
 17 exposes Meta to the risk of competitive harm.

18 4. Exhibit 2 comprises excerpts of the deposition transcript of Melanie Kambadur,
 19 which includes discussion of highly sensitive information regarding Meta's AI technical
 20 development. Public disclosure of the redacted information exposes Meta to the risk of competitive
 21 harm.

22 5. The Joint Letter Brief contains information quoting and reflecting the contents of
 23 Exhibits 1 and 2, as well as the contents of previously sealed ECF Nos. 162-4, 162-5, 162-11, 162-
 24 12, 162-13, 162-14 which is discussed in ECF Nos. 161, 161-1, 161-2, and was sealed at ECF No.
 25 172. Public disclosure of the redacted information in the Joint Letter Brief exposes Meta to the risk
 26 of competitive harm.

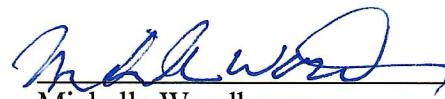
27 6. Exhibit 4 is Plaintiffs' Rule 30(b)(6) notice, which includes topics that discuss

1 specific information regarding Meta's AI technical development and potential plans that have not
2 been disclosed to the public. Public disclosure of the redacted information exposes Meta to the risk
3 of competitive harm.

4 7. Public disclosure of the information contained in the above-referenced exhibits
5 exposes Meta to the risk of competitive and financial harm, by revealing Meta's non-public
6 business strategies, trade secret information pertaining to its generative AI offerings, and
7 competitive analyses.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct

10 Executed in San Jose, California on this 30th day of September, 2024.

11
12 
13 Michelle Woodhouse

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28